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Counsel to Ad Hoc Group of Equity Interest Holders

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	: Chapter 11
VOYAGER DIGITAL HOLDINGS, INC., et al. ¹	: Case No. 22-10943 (MEW)
	: (Jointly Administered)
Debtors.	:
	:

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE OF NOTICES AND PLEADINGS**

PLEASE TAKE NOTICE that, pursuant to Rules 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and section 1109(b) of Title 11 of the United States Code, the Ad Hoc Group of Equity Interest Holders of Voyager Digital Ltd. (the “AHG”), by and through its undersigned counsel, Kilpatrick Townsend & Stockton LLP, hereby requests that all notices given or required to be given in the above-captioned cases, and all papers served or required to be served in these cases, be given to and served upon the following:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

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PLEASE TAKE FURTHER NOTICE that this request (the “Request”) constitutes not only a request for service of the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, a request for service of all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, telex or otherwise, that affects or seeks to affect in any way any rights or interests of any creditor or party in interest in these cases, with respect to: (i) the above-captioned debtors (the “Debtors”); (ii) property of the Debtors’ estates, or proceeds thereof, in which the Debtors may claim an interest; or (iii) property or proceeds thereof in possession, custody or control of others that the Debtors may seek to use.

PLEASE TAKE FURTHER NOTICE that neither this Request nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive (i) the AHG’s right to have final judgments and final orders entered by an Article III judge in any matters that

constitutionally can be finally adjudicated only by an Article III judge unless all parties consent to final adjudication by a non-Article III judge; (ii) the AHG's right to trial by jury in any proceeding so triable in any case, controversy or adversary proceeding; (iii) the AHG's right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which the AHG is or may be entitled under any agreement(s), in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: September 19, 2022

KILPATRICK TOWNSEND & STOCKTON LLP

/s/ David M. Posner

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CERTIFICATE OF SERVICE

I hereby certify that on September 19, 2022, I caused a true and exact copy of the foregoing **NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF NOTICES AND PLEADINGS** to be filed electronically with the Clerk of the Court using the CM/ECF system which in turn will send notification of such filing to all interested parties of record.

/s/ David M. Posner
David M. Posner